

1 RENE L. VALLADARES
2 Federal Public Defender
3 Nevada State Bar No. 11479
4 KATHRYN C. NEWMAN
5 Assistant Federal Public Defender
6 Nevada State Bar No. 13733
7 411 E. Bonneville, Ste. 250
8 Las Vegas, Nevada 89101
9 (702) 388-6577/Phone
10 (702) 388-6261/Fax
11 Kathryn_Newman@fd.org

12 Attorney for Samuel Lane Donesing

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,
16 Plaintiff,
17 v.
18 SAMUEL LANE DONESING, and
19 JAEMILLA EAGENS,
20 Defendants.

21 Case No. 2:18-cr-246-RFB-NJK

22 **UNOPPOSED MOTION FOR
23 PREPAREATION OF PRE-PLEA
24 PRESENTENCE REPORT (PSR)**

25 Defendant Samuel Donesing requests the Court enter an order directing the United
26 States Department of Probation to prepare a Pre-Plea Presentence Investigation Report (PSR)
to determine the defendant's Criminal History.

On DATE, Mr. Doensing was charged in a X count indictment with X and Y. The
parties are attempting to negotiate this case. The parties believe that they may be able to resolve
this case short of trial. Based on defense counsel's review of Mr. Donesing's criminal record,
there appear to be a number of issues with respect to how his prior convictions will be counted.
To satisfy Mr. Donesing's concerns and to assure that he has the information he needs to make
a truly knowing and intelligent decision, as to whether to accept or reject a plea offer, he has
requested that a Pre-Plea Presentence Investigation Report be completed so that he understands

how Probation will calculate his Criminal History Points and corresponding category. Defense counsel has spoken with AUSA Linda Mott and she does not oppose this motion.

Conclusion

Mr. Donesing respectfully requests the Court order the United States Department of Probation to prepare a Pre-Plea Presentence Investigation Report to determine his Criminal History Points and corresponding Criminal History Category.

DATED this 6th day of May, 2019.

RENE L. VALLADARES
Federal Public Defender

By: /s/ Kathryn C. Newman

KATHRYN C. NEWMAN
Assistant Federal Public Defender
Attorney for Samuel Lane Donesing

[PROPOSED] ORDER

IT IS HEREBY ORDERED, based on the foregoing motion, and good cause appearing, that the United States Department of Probation for the District of Nevada shall prepare a Pre-Plea Presentence Investigation Report (PSR) with respect to Defendant Samuel Lane Donesing's Criminal History Points and Criminal History Category.

RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATED: May 5, 2010

DATED. May 7, 2019.

1

2 **CERTIFICATE OF ELECTRONIC SERVICE**

3

4 The undersigned hereby certifies that she is an employee of the Federal Public Defender
5 for the District of Nevada and is a person of such age and discretion as to be competent to serve
6 papers.

7 That on May 6, 2019, she served an electronic copy of the above and foregoing
8 Unopposed Motion for Preparation of a Pre-Plea PSR by electronic service (ECF) to the person
9 named below:

10 NICHOLAS. TRUTANICH
11 United States Attorney
12 LINDA MOTT
13 Assistant United States Attorney
14 501 Las Vegas Blvd. South
15 Suite 1100
16 Las Vegas, NV 89101

17 _____
18 */s/ April Graham*
19 Employee of the Federal Public Defender